

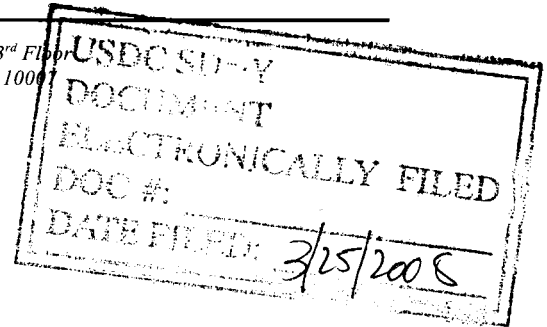


U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007

March 6, 2008



By Hand

Hon. William H. Pauley  
United States District Judge  
United States Courthouse  
500 Pearl Street, Room 2210  
New York, New York 10007

Re: Natural Resources Defense Council, Inc. v. U.S. Dep't of State,  
No. 07 Civ. 5929 (WHP)

Dear Judge Pauley:

I represent the United States Department of State (the "Government") in the above-referenced Freedom of Information Act ("FOIA") matter and write respectfully to request an extension of time from March 7, 2008, to March 14, 2008, for the Government to serve and file its motion for summary judgment and opposition to plaintiff NRDC's motion for summary judgment. This is the Government's first request for an extension of time. Plaintiff's counsel, Thom Cmar, consents to this request.

I make this request because I have been unable to complete the briefing in this matter because of the press of other business. Specifically, I was required to be out of the Office during the week of February 25, 2008, to conduct a site visit and interviews of approximately 15 witnesses in an ongoing civil rights investigation. In addition, upon my return this week, there were unexpected developments in another investigation that required immediate attention. Although substantial progress has been made on the Government's briefing in this case, I will be unable to complete the papers by tomorrow, March 7, 2008.

*application granted. Plaintiff shall serve and file any reply and/or opposition by April 4, 2008 and Defendant shall serve and file any reply by April 15, 2008.*  
SO ORDERED: *this court will hear oral argument on May 4, 2008 at 3:00 p.m.*

*William H. Pauley III*  
WILLIAM H. PAULEY III U.S.D.J.

3/13/2008

Hon. William H. Pauley

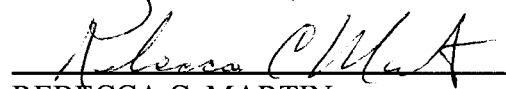
March 6, 2008

Thank you for your consideration of this request.

Respectfully submitted,

MICHAEL J. GARCIA  
United States Attorney

By:

  
REBECCA C. MARTIN  
Assistant United States Attorney  
Telephone: (212) 637-2714  
Facsimile: (212) 637-2686

cc: Thomas Cmar, Esq.  
Natural Resources Defense Council  
1200 New York Ave., N.W.  
Suite 400  
Washington, DC 20005  
(By E-mail and First Class mail)